

EXHIBIT A

based on "2007 Code" which is all intellectual property belonging to defendants pursuant to the disputed 2007 Independent Contractors Agreement. I must have access to Plaintiff's source code from January 1, 2007 forward to be able to put on my claims. The requested discovery is relevant and material to defendants' claims.

6. The amount of computer code that will be required to analyze will be substantial, and Plaintiff by refusing to produce the code and forcing the defendants to yet again seek a court hearing has delayed the code production to where it will be impossible for defendants to properly analyze the code and prepare for trial, which is only days away.

7. Defendants will be substantially prejudiced and suffer harm if they are not permitted to have the proper time to analyze before trial. The deadline to submit all trial exhibits is only 24 hours away, and yet defendants have not seen discovery integral to their claims. The defendants remaining counterclaims are all based on the 2007 and beyond Source code and the defendants cannot put on their case without having the proper time to review the many thousands of files of source code. There simply is not enough time for me to review all the materials when I finally do see it. There just is not enough time in the day.

8. Defendants have been trying to get the evidence for many months and have diligently used all discovery procedures. Defendants have brought this issue before the court several times and still the Plaintiff refuses to produce the source code that has been requested.

9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 8, 2010.

 03/08/11

D. Dante Lorenso